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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

E-FILED - 5/2/07

COALITION FOR ICANN)	Case No. 5:05-CV-04826 (RMW) PVT
TRANSPARENCY INC., a Delaware)	
corporation,)	STIPULATION AND PROPOSED ORDER
)	TO CONTINUE CERTAIN PROSPECTIVE
Plaintiff,)	PRE-TRIAL DEADLINES;
)	DECLARATION OF ANGEL L. TANG
v.)	
)	
VERISIGN, INC., a Delaware corporation;)	
)	
Defendant.)	
)	
)	

STIPULATION AND ~~PROPOSED~~ ORDER TO CONTINUE CERTAIN PROSPECTIVE PRETRIAL DEADLINES;
DECLARATION OF ANGEL L. TANG
Case No. 05-CV- 04826 (RMW) PVT

Defendant VeriSign, Inc. ("VeriSign") and plaintiff Coalition for ICANN Transparency Inc. ("CFIT") submit this stipulation, based on the following facts, to continue certain pre-trial deadlines. The parties so stipulate to avoid the potentially unnecessary expenditure of time and resources on matters that may soon be rendered moot by the Court's final order on VeriSign's Motion to Dismiss the Second Amended Complaint of CFIT. The Motion was heard by the Court on March 9, 2007, and was taken under submission.

On May 3, 2006, the parties submitted to the Court the following schedule of proposed pretrial and trial dates:

Deadline to file motion to add parties or amend pleadings	October 13, 2006
Completion of all fact discovery	March 1, 2007
Deadline to file any fact discovery motions	March 6, 2007
Exchange expert disclosures/reports	March 30, 2007
Exchange rebuttal expert disclosures/reports	May 3, 2007
Completion of all expert discovery	June 8, 2007
Deadline to file any expert discovery motions	June 19, 2007
Deadline for completion of ADR process	July 14, 2007
Deadline for filing summary judgment motions	July 27, 2007
Final Pretrial Conference	November 1, 2007
Trial	December 3, 2007

[Docket No. 161]. The proposed schedule was adopted and entered by the Court in its minute order of May 5, 2006. [Docket No. 164].

On March 9, 2007, the Court heard oral argument on VeriSign's Motion to Dismiss CFIT's Second Amended Complaint ("Motion to Dismiss"). Following the hearing, the Court took the matter under submission. In its tentative ruling issued the day prior to the hearing, the Court

1 granted VeriSign's Motion to Dismiss in its entirety with prejudice. To date, the parties have not
2 received the Court's final order on VeriSign's Motion to Dismiss.

3 On or around March 20, 2007, the parties submitted a stipulation to continue the dates of
4 two intervening deadlines, as they were awaiting the Court's final ruling on the Motion to Dismiss.
5 Specifically, the parties continued the deadline for exchange of expert disclosures and/or reports
6 from March 30, 2007 to April 30, 2007, and the deadline for exchange of rebuttal expert disclosures
7 and/or reports from May 3, 2007 to May 15, 2007. No other pretrial dates, including the trial date,
8 were affected by the March 20 stipulation. The stipulation was entered by Magistrate Trumbull on
9 March 20, 2007. [Docket No. 197].¹

10 Because the Court has not yet issued its final order on VeriSign's Motion to Dismiss, and
11 the previously continued expert disclosure deadlines are fast approaching, the parties again request
12 that the Court grant a continuance of those dates, in addition to other pre-trial dates. The parties
13 propose that the following schedule be adopted by the Court:

PROSPECTIVE DEADLINES	CURRENT DATE	PROPOSED DATE
Exchange expert disclosures/reports	April 30, 2007	May 30, 2007
Exchange rebuttal expert disclosures/reports	May 15, 2007	June 15, 2007
Completion of all expert discovery	June 8, 2007	July 9, 2007
Deadline to file any expert discovery motions	June 19, 2007	July 19, 2007
Deadline for completion of ADR	July 14, 2007	August 14, 2007

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¹ As requested by the parties, Magistrate Trumbull also took off calendar VeriSign's then pending motions to compel further discovery responses. This continuance was granted without prejudice to VeriSign's right to re-file the motions to compel within twenty (20) days of the Court's final order on the Motion to Dismiss.

FROM

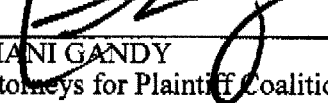
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process		
Deadline for filing summary judgment motions	July 27, 2007	August 27, 2007
Final Pretrial Conference	November 1, 2007	No change
Trial	December 3, 2007	No change

Dated: April 24, 2007

ARNOLD & PORTER LLP
ANGEL L. TANGBy: 
ANGEL L. TANG
Attorneys for Defendant VeriSign, Inc.

Dated: April 24, 2007

CATHCART COLLINS LLP
IMANI GANDYBy: 
IMANI GANDY
Attorneys for Plaintiff Coalition for
ICANN Transparency Inc.**ORDER**

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

DATE 5/2/07
HON. RONALD M. WHYTE
DISTRICT COURT JUDGE

DECLARATION OF ANGEL L. TANG

I, Angel L. Tang, hereby declare as follows:

1. I am a member of the bar of the State of California and am an attorney with Arnold & Porter LLP, attorneys for defendant VeriSign, Inc. ("VeriSign") in this action. I make this declaration pursuant to Northern District Local Civil Rule 6-2(a) in support of the parties' Stipulation to Continue Hearing Date on Certain Prospective Pretrial Deadlines. Unless otherwise stated, I have personal knowledge of the facts stated in this declaration and if called as a witness could and would testify consistently thereto.

2. On March 9, 2007, the Court heard oral argument on VeriSign's Motion to Dismiss CFIT's Second Amended Complaint ("Motion to Dismiss"). Following the hearing, the Court took the matter under submission. In its tentative ruling issued the day prior to the hearing, the Court granted VeriSign's Motion to Dismiss in its entirety with prejudice.

3. Because the parties are awaiting the Court's final order on the Motion to Dismiss, which potentially could dispose of this entire action, the parties have agreed to enter into the following stipulation for the sake of economy and to prevent the unnecessary expenditure of time and resources on motions and discovery matters that may be soon rendered moot by the Court's order on VeriSign's Motion to Dismiss. The parties have stipulated to the following prospective schedule:

PROSPECTIVE DEADLINES	CURRENT DATE	PROPOSED DATE
Exchange expert disclosures/reports	April 30, 2007	May 30, 2007
Exchange rebuttal expert disclosures/reports	May 15, 2007	June 15, 2007
Completion of all expert discovery	June 8, 2007	July 8, 2007
Deadline to file any expert discovery motions	June 19, 2007	July 19, 2007
Deadline for completion of ADR	July 14, 2007	August 14, 2007

process		
Deadline for filing summary judgment motions	July 27, 2007	August 27, 2007
Final Pretrial Conference	November 1, 2007	No change
Trial	December 3, 2007	No change

3. Previously, the parties stipulated to or requested an extension of time on the following occasions:

(1) On December 16, 2005, CFIT filed a Notice of Motion and Motion to Shorten Time on Plaintiff's Motion for Limited Expedited Discovery, Continuance of the Preliminary Injunction Hearing, and a Briefing Schedule, which requested an early hearing date and briefing schedule on the subject motion. [Docket No. 41]

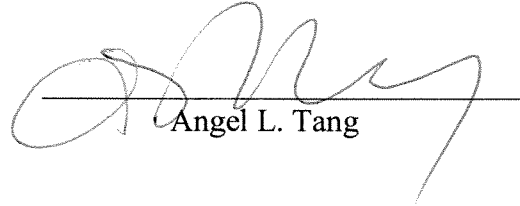
(2) On January 20, 2006, the parties filed a Stipulation re Expedited Discovery, which adopted a schedule for the limited expedited discovery ordered by the Court. [Docket No. 94]

(3) On March 29, 2006, the parties filed a Stipulation on Briefing Schedule for Defendants' Motions to Dismiss Plaintiff's First Amended Complaint, which provided defendants an additional ten (10) days to respond to CFIT's First Amended Complaint. [Docket No. 145]

(4) On January 8, 2007, the parties filed a Stipulation Extending Time for VeriSign, Inc. to Respond to Second Amended Complaint, which provided VeriSign with an addition fifteen (15) days to respond to CFIT's Second Amended Complaint. [Docket No. 184].

(5) On March 20, 2007, the parties filed a Stipulation to Continue Hearing Date on VeriSign, Inc.'s Motions to Compel and Certain Prospective Pre-Trial Deadlines, which continued VeriSign's then-pending motions to compel and the deadlines for disclosure of expert reports and rebuttal expert reports.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct and that this declaration was executed on April 24, 2007, in Los Angeles,
3 California.

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6 Angel L. Tang

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